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10 Attorneys for Defendant  
LEE KEITH BRETT

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14

15 LFP IP, LLC,  
16  
Plaintiff,  
17  
v.  
18 LEE KEITH BRETT,  
19  
Defendant.

CASE NO. 2:16-cv-00166

Hon. Frederick F. Mumm

**DEFENDANT LEE KEITH  
BRETT'S AMENDED WITNESS  
LIST**

Pretrial Conference: September 12, 2018

First Day of Trial: October 2, 2018

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**DEFENDANT'S AMENDED WITNESS LIST**  
CASE NO. 2:16-CV-00166

1 Pursuant to the Court's Civil Trial Order dated June 26, 2018, Defendant Lee  
2 Keith Brett ("Defendant" or "Mr. Brett") respectfully submits the following  
3 Amended Witness List:

4 1. Lee Keith Brett

5 Mr. Brett's expected testimony will concern the "American Hustler"  
6 trademark, his company, and the pool industry.

7 2. James Harris

8 Mr. Harris' expected testimony will concern the use of the word "hustler" in  
9 the pool industry and American Hustler clothing.

10 3. Larry Flynt

11 Mr. Flynt's expected testimony will concern the history and use of the  
12 Hustler trademarks at issue in this action; the development of retail and apparel  
13 brands; and the registration of other trademarks using the word "hustler" not owned  
14 by Plaintiff.

15 4. Tina Ryoo\*

16 Ms. Ryoo's expected testimony will concern the licensing, sales, and  
17 distribution of Plaintiff's clothing; Hustler Hollywood; and use of the Hustler  
18 trademarks at issue in this action.

19 5. Phillip Del Rio\*

20 Mr. Del Rio's expected testimony will concern the retail sales and  
21 distribution of Plaintiff's clothing; Hustler Hollywood; and use of the Hustler  
22 trademarks at issue in this action.

23 6. Tony Cochi\*

24 Mr. Cochi's expected testimony will concern Plaintiff's internet sales,  
25 distribution, and licensing agreements; Hustler Hollywood; and use of the Hustler  
26 trademarks at issue in this action.

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1 Pursuant to Local Rule 16-5, witnesses designated with an \* shall be called  
2 only if the need arises. Defendant reserves the right to call additional witnesses not  
3 named herein as necessary for rebuttal and/or impeachment, and otherwise reserves  
4 the right to amend, add to, or withdraw witnesses from the foregoing list.

5 With the exception of Larry Flynt, Tina Ryoo, Phillip Del Rio, and Tony  
6 Cochi, all of whom are believed to be employees or agents of Plaintiff, the  
7 witnesses on this list may be contacted through counsel for Defendant.

8 Dated: August 22, 2018

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

11 By: /s/ Jason D. Strabo

12 Jason D. Strabo  
13 Attorneys for Defendant  
14 LEE KEITH BRETT